



November 13, 2015

**VIA ELECTRONIC MAIL**

Wendy Jacobs  
Merrily Gere  
Conn. Dept. of Energy & Env'tl. Protection  
79 Elm Street  
Hartford, CT 06106  
Email: [wendy.jacobs@ct.gov](mailto:wendy.jacobs@ct.gov)  
[merrily.gere@ct.gov](mailto:merrily.gere@ct.gov)

**RE: Supplemental Comments of the Sierra Club Regarding Proposed Revisions to R.C.S.A. § 22a-174-22**

Dear Ms. Jacobs and Ms. Gere:

The Sierra Club respectfully submits the following supplemental comments regarding the latest November 9, 2015 draft of Connecticut's proposed Reasonably Available Control Technology ("RACT") requirements for nitrogen oxides ("NOx") to be codified at R.C.S.A. § 22a-174-22e. The Sierra Club appreciates the Department's efforts to address the comments previously submitted by the Sierra Club. We believe the changes made by the Department are beneficial and help ensure comparable stringency between the different compliance options in the draft regulation.

Given the increasing parity between the stringency of Phase 2 NOx requirements in Section (d), the alternative compliance options set forth in Section (g), and the case-by-case RACT provisions in Section (h), we believe that the Phase 2 NOx RACT requirement for coal-fired boilers serving an EGU set forth in Section (d)(2)(C) is now out of line with the stringency of the Section (g) and (h) requirements. Attached, please find an analysis by Dr. Ranajit Sahu comparing the stringency of Section (d)(2)(C) as it would apply in Connecticut with the comparable control requirements set forth in Sections (g) and (h). Based on Dr. Sahu's analysis, Bridgeport Harbor Station Unit 3, the lone affect coal-fired EGU under Section (d)(2)(C) would be able to comply with the current 0.12 lb/MMBtu limit in Section (d)(2)(C) through installation and operation of selective non-catalytic reduction (SNCR), but would not be able to achieve a control efficiency with this technology analogous to the 40% level of reduction set forth in the alternative compliance options in Section (g). Rather, with an SNCR, the unit would only achieve approximately 20% reduction in NOx emissions. By contrast, installation and operation of selective catalytic reduction (SCR) would readily achieve or exceed the control efficiency of the Section (g) alternative compliance options and, based on the cost-effectiveness methodology set forth in Section (h), would be cost-effective for installation on this unit.

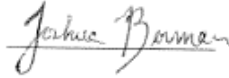
Wendy Jacobs & Merrily Gere

Page 2 of 2

Nov. 13, 2015

Thank you for your consideration, and please let me know if there is any additional information I can provide regarding any of the above comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "Joshua Berman".

Joshua Berman

Staff Attorney

Sierra Club

50 F St. NW, 8<sup>th</sup> Floor

Washington, DC 20001

Tel: (202) 650-6062

Email: [Josh.Berman@sierraclub.org](mailto:Josh.Berman@sierraclub.org)